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**Subject:** RE: [External]Gasco/Siltronic design deliverables and schedule  
**Date:** Monday, April 17, 2017 8:03:54 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[Gasco Sediments Site Post-ROD Schedule of Deliverables\\_041417.pdf](#)

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Hi Sean,

As requested in your email on March 27, 2017, attached please find NW Natural's proposed updated schedule of project deliverables for the Gasco Sediments Site. NW Natural proposes submittal of the following deliverables to EPA as a bridge between the May 2012 draft EE/CA and preparation of remedial design documents consistent with EPA's January 2017 Portland Harbor Record of Decision. The schedule we propose would update Table 1 of the 2009 Gasco Sediments Site Statement of Work (SOW), and essentially replaces the Final EE/CA finalization step with the bridge components:

1. **Pre-remedial Design Technical Evaluations and Basis for Design Work Plan:** the purpose of this document will be to submit to EPA for review and approval the RAOs and associated performance standards for the Gasco Sediments Site remedy, the proposed methods to define the boundaries of Gasco Sediments Site project area based on the criteria for active cleanup areas identified in the ROD, and the proposed site-specific technical evaluation methods that will be performed in accordance with the ROD decision framework and pertinent pre-design work from the EE/CA to design the final remedy for the Gasco Sediments Site. As we discussed during our March 2 meeting, this document will help ensure NW Natural and EPA agree on the full range of technical evaluations required by the ROD, the specific technical evaluation methods to be used, and the associated data needs for each method and whether data gaps exist. Once approved, we will be able to move forward with data gaps sampling and any necessary technical evaluations.
2. **Data Gaps Sampling Work Plan and Sampling and Analysis Plan:** NW Natural expects that some additional data collection may be necessary to support remedial design development. Therefore, the proposed schedule includes design-level data gaps sampling plan development and resulting field work, laboratory analysis, and data validation. It is possible that NW Natural or EPA may identify additional design data gaps, and in that event, NW Natural would coordinate with EPA to define the appropriate additional steps and timing of such work. Accordingly, the suggested delivery times for the Preliminary, Interim and Final Designs would need to be revised in coordination with EPA.
3. **Sediment Remedy Technical Evaluation and Basis for Design Memoranda:** these memoranda will provide the results of the EPA-approved technical evaluations identified in the Pre-Remedial Design Technical Evaluations and Basis for Design Work Plan. The memoranda will be submitted non-concurrently within a 120-day period from receipt of validated data to allow EPA to perform a detailed individual review on each technical evaluation. The specific technical evaluations to be performed are dependent on EPA comments on the Pre-Remedial Design Technical Evaluations and Basis for Design Work Plan. NW Natural currently anticipates submittal of the following memoranda: evaluation of the Gasco Sediments Site cleanup extents; evaluation of capping protectiveness; evaluation of water quality best management practices during dredging; evaluation of riverbank remedial technologies; evaluation of dredge material treatment, handling and disposal; evaluation of habitat and flooding impacts; and overall remedy description. NW Natural will proceed with development of the Preliminary Design Report following EPA approval of all the submitted memoranda.
4. **Preliminary Design Report:** this document will be developed in accordance with Section 3.7.1 of the Gasco Sediments Site SOW.

5. **Interim Design Report:** this document will be developed in accordance with Section 3.7.2 of the Gasco Sediments Site SOW.
6. **Final Design Report:** this document will be developed in accordance with Section 3.7.3 of the Gasco Sediments Site SOW.

I suggest we schedule a meeting to discuss this approach, and look forward to keeping the project moving forward. Please let me know if you have any questions.

Thank you,

Bob

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**From:** Sheldrake, Sean [sheldrake.sean@epa.gov]  
**Sent:** Monday, March 27, 2017 3:05 PM  
**To:** Wyatt, Robert; myron.burr@siltronic.com  
**Cc:** bayuk.dana@deq.state.or.us; Lance Peterson (PetersonLE@cdmsmith.com); GREENFIELD Sarah  
**Subject:** [External]Gasco/Siltronic design deliverables and schedule

Good afternoon Bob and Myron,

Per our meeting on March 2, EPA requires a schedule from you for review and approval for design deliverables moving forward. Please convey this schedule to EPA no later than Monday, April 17.

Thank you and let me know if you have any questions.

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